



United States Environmental Protection Agency  
Washington, D.C. 20460

## Water Compliance Inspection Report

### SECTION A: National Data System Coding (i.e., PCS)

Transaction Code N 5	NPDES TNS077780	YR/MO/DAY 11/1/31	Inspection Type C	Inspector S	Facility Type 1
Remarks					
Inspection Work Days 3.5	Facility Self-Monitoring Evaluation Rating 4	BI N	QA N	Reserved	

### SECTION B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Bluff City MS4 P.O. Box 70 Bluff City, TN 37618	Entry Time/Date 10/12/21 9:00 AM	Permit Effective Date 03/7/07
	Exit Time/Date 10/12/21 4:30 PM	Permit Expiration Date 08/2/26
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) Sarah Ketron/MS4 Coordinator/(423)538-7144 Fax(423)538-7138	Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number Honorable J.C. Gentry/Vice-Mayor/(423)538-7144 Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

### SECTION C: Areas Evaluated During Inspection (Check only those areas evaluated)

X	Permit		Self-Monitoring Program		Pretreatment	X	MS4
X	Records/Reports		Compliance Schedules	X	Pollution Prevention		
X	Facility Site Review		Laboratory	X	Storm Water		
	Effluent/Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow		
	Flow Measurement		Sludge Handling/Disposal		Sanitary Sewer Overflow		

### SECTION D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

See Attached Report
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Name(s) and Signature(s) of Inspector(s) Brown Patton	Agency/Office/Phone and Fax Numbers DWPC/JCEFO/(423)854-5458 Fax (423)854-5401	Date 2-1-11
Signature of Management QA Reviewer 	Agency/Office/Phone and Fax Numbers DWPC/JCEFO/(423)854-5447 Fax (423)854-5401	Date 2-2-11



**Johnson City Field Office**  
**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**2305 SILVERDALE ROAD**  
**JOHNSON CITY, TENNESSEE 37601-2162**  
**(423) 854-5400 STATEWIDE 1-888-891-8332 FAX (423) 854-5401**

January 26, 2011

Mr. J.C. Gentry  
Vice Mayor of Bluff City  
P.O. Box 70  
Bluff City, TN 37618

Certified Mail #70101870000269636525  
Return Receipt Requested

RE: Notice of Deficiency  
Compliance Evaluation Inspection  
Bluff City Municipal Separate Storm Sewer System (MS4) Phase II  
NPDES Permit TNS077780

Dear Vice-Mayor Gentry:

Bluff City, as part of a regulated small municipal storm sewer system (MS4), was required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage and develop a storm water program. A Notice of Coverage was issued on July 3, 2003 and became effective on July 7, 2003.

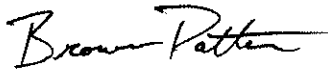
On December 21, 2010, I met with Ms. Sarah Ketron, City of Bluff City Stormwater Coordinator, in order to conduct a Compliance Evaluation Inspection (CEI) of your MS4 program. The NPDES permit, Section 4.2, identifies six minimum control measures that must be addressed in the storm water management program. The attached inspection report addresses the NPDES permit requirements, evaluation of each control measure as stated on the MS4's Notice of Intent (NOI), relative documentation, as well as a field inspection of the City Garage. This letter serves to document the CEI and notify you of the deficiencies noted during the inspection.

Section 4.1.2 of the NPDES permit identifies four implementation deadlines. The City has met the required deadlines for this permit cycle. The City of Bluff City's annual report was received on September 24, 2010.

Please submit a **Plan of Corrective Action** as well as a detailed implementation schedule to this office addressing these deficiencies within **30 days** of receipt of this letter.

The Division would like to thank Ms. Ketron for her time and assistance during this inspection. If you have any questions regarding the inspection or report, please contact me at (423) 854-5458 or by email at [brown.patton@tn.gov](mailto:brown.patton@tn.gov).

Sincerely,

A handwritten signature in cursive script that reads "Brown Patton".

Brown Patton  
Environmental Specialist  
Johnson City Environmental Field Office  
Division of Water Pollution Control

Cc: Sarah Ketron, Stormwater Coordinator, P.O. Box 70, Bluff City, Tennessee 37618  
Cc: DWPC, Enforcement and Compliance Section, Nashville Central Office

**Bluff City Municipal Separate Storm Sewer System (MS4) – Phase II**  
**NPDES Permit Tracking Number TNS077780**

The following items outline the deficiencies observed during the City of Bluff City's Compliance Evaluation Inspection.

**Public Education and Outreach on Storm Water Impacts**

**NPDES Permit – Section 4.2.1**

**BMP 1D:** Commercial Pollution Prevention

Measurable Goal: Develop and distribute commercial pollution prevention brochures as stated in the BMPs. The City stated they would develop a brochure in year one and distribute it in year two. The City is using the brochure "Spills, Cleaning, Storage" which are being mailed to Bluff City businesses. The majority of businesses in Bluff City are restaurants and automotive stores. The City did not meet their milestone as there were no mailings during this permit cycle.

**BMP 1E:** Residential Pollution Prevention

The initial BMP referenced a brochure to focus on activities homeowners can undertake to reduce pollution from stormwater runoff. The brochures were to be left at City Hall where they would be handed out to residents paying their water bills. This BMP was changed to a website that gives tips on preventing pollution, [www.bluffcitytn.org/stormwater](http://www.bluffcitytn.org/stormwater). Section 4.5.2.2 states that changes replacing an ineffective or infeasible BMP must be clearly outlined as described in Section 4.5.2.2.1 *et seq.* and included in the subsequent annual report. The City's annual report did not reference this BMP change. This permit requirement was not met.

**Illicit Discharge Detection and Elimination**

**NPDES Permit – Section 4.2.3.1.4** states that the MS4 will develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system. The City has developed a plan to detect and address non-storm water discharges but does not address illegal dumping. This permit requirement was not met.

**BMP 3B:** Illicit Discharge and Detection Ordinance

Measurable Goal: Develop, adopt and enforce an ordinance dealing with the concerns addressed in Section 3 of NOI. The City of Bluff City adopted an ordinance in January of 2008 with amendments adopted May 29, 2009. The ordinance defines "hot spots" but does not address "hot spots" in the regulations. In Section 4.2.3.2 of the permit, it states that you must be able, by ordinance or other regulatory mechanism, to prohibit contamination of storm water runoff from hot spots. This permit requirement has not been met.

### **Construction Site Storm Water Runoff Control**

NPDES Permit – Section 4.2.4.1.4 states that your program must include the development and implementation of requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality. This permit requirement has not been met.

### **Post-Construction Storm Water Management in New Development and Redevelopment**

NPDES Permit – Section 4.2.5.1.5 states that your program must ensure long-term operation and maintenance of BMPs. This permit requirement was not met.

### **Pollution Prevention/Good Housekeeping for Municipal Operations**

NPDES Permit – Section 4.2.6.1.3 states that in developing your program, you must consider procedures for properly disposing of waste removed from the separate storm sewers and other areas associated with storm water controls as well as maintenance schedules for the storm water controls. This permit requirement has not been met.

As part of this inspection, the city garage/maintenance yard was visited. Outside storage cover consisted of a camper top and an awning. Barrels were observed sitting directly on the ground and one containing used oil filters without a lid. These barrels must be stored in such a manner to prevent contact with both rainfall events as well as stormwater runoff. Majority of maintenance performed at city garage consists of oil changes. Documentation tracking the used oil was not available.